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THE NEW YORK TIMES COMPANY

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THE NEW YORK TIMES COMPANY

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

TARA READE,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY,

Defendant.

CASE NO. 2:22-CV-00543-WBS-KJN

**STIPULATION AND ORDER TO
RESCHEDULE DATE OF STATUS
(PRETRIAL SCHEDULING) CONFERENCE
(DOCKET NO. 3)**

Conference Date: July 18, 2022

Time: 1:30 p.m.

Dept.: 5

New Proposed Date: August 22, 2022

Complaint Filed: February 22, 2022

Pursuant to the United States District Court, Eastern District of California, Local Rules 143 and 144, Plaintiff Tara Reade ("Plaintiff") and Defendant The New York Times Company ("Defendant") (collectively, the "Parties") hereby file this Stipulation to reschedule the July 18, 2022 Status (Pretrial Scheduling) Conference and all related deadlines until August 22, 2022, or to a date thereafter that is convenient for the Court.

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1 WHEREAS, on February 22, 2022, Plaintiff filed a Complaint against Defendant in the
2 Superior Court of California, County of Nevada, Case No.: CU22-086270, (Docket ("Dkt.") No. 1-
3 2);

4 WHEREAS, Defendant filed a Notice of Removal on March 24, 2022, (Dkt. No. 1);

5 WHEREAS, on March 24, 2022, the Court scheduled a Status (Pretrial Scheduling)
6 Conference for July 18, 2022, at 1:30 PM before Senior Judge William B. Shubb (Dkt. No. 3);

7 WHEREAS, on April 21, 2022, Defendant filed a Motion to Dismiss Plaintiff's Complaint
8 (Dkt. No. 10) and a Special Motion to Strike (Dkt. No. 11), the hearing for which took place June
9 27, 2022 (Dkt. No. 17);

10 WHEREAS, on July 1, 2022, this Court granted Defendant's Motion to Dismiss and Special
11 Motion to Strike (Dkt. No. 21). In so doing, the Court granted Plaintiff 20 days leave to amend;

12 WHEREAS, the Parties believe that setting the Status (Pretrial Scheduling) Conference to a
13 date after any amended Complaint is filed will assist with the thorough evaluation of issues to be
14 addressed as required by Rule of Civil Procedure 26(f) in advance of the preparation and filing of a
15 Joint Status Report, as directed within Dkt. No. 3. The Parties believe that the proposed continuance
16 will further the interests of judicial efficiency and economy as it will ensure that only matters that
17 are being litigated are before the Court on Pretrial Scheduling issues;

18 WHEREAS, this is the Parties' first request for a continuance of the Status (Pretrial
19 Scheduling) Conference;

20 WHEREAS, a continuance will impact only Rule 26 related deadlines; no other dates or
21 deadlines in this matter will be impacted;

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2 NOW, THEREFORE, the Parties stipulate and jointly request that the Court continue the
3 July 18, 2022 Status (Pretrial Scheduling) Conference to August 22, 2022, or to a date thereafter that
4 is convenient for the Court; and that all Rule 26 deadlines will flow from the new Status (Pretrial
5 Scheduling) Conference date.

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7 **IT IS SO STIPULATED.**

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9 DATED: July 5, 2022

AKERMAN LLP

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11 By: /s/ Kanika D. Corley

12 Kanika D. Corley

13 Attorneys for Defendant

14 THE NEW YORK TIMES COMPANY

15 DATED: July 5, 2022

PHOCUS LAW

16 By: /s/ Samuel C. Richardson

17 Samuel C. Richardson

18 Attorneys for Plaintiff

TARA READE

19 Signatories hereby do attest that all signatories listed, and on whose behalf the filing is
20 submitted, concur in the filing's content and have authorized the filing.

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ORDER

Pursuant to the stipulation of the Parties, and finding the existence of good cause, IT IS ORDERED that the Status (Pretrial Scheduling) Conference, currently set for July 18, 2022, is continued to **August 29, 2022 at 1:30 p.m.** The Parties are to file their Joint Report no later than **August 15, 2022**, consistent with the requirements set forth in Rule 26 and this Court's Order Re: Status (Pretrial Schedule) Conference (Dkt. No. 3).

IT IS SO ORDERED.

Dated: July 6, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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